

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
EUGENE DIVISION

SHASTA WINN,  
pro se Plaintiff,

vs.

THE HIGHER EDUCATION COORDINATING COMMISSION (HECC), RAMONA RODAMAKER,  
VERONICA DUJON, SEAN BRADY, THE OREGON HEALTH AUTHORITY (OHA), TINA KOTEK,  
SAM CHAPMAN, TOM ECKERT, AND AFFILIATED PARTIES,  
Defendants

Case No # 6:24-cv-00004-MC

Motion For Leave to Amend Complaint

I, Shasta Winn, the Plaintiff in the above-mentioned case, respectfully submit this Motion for Leave to Amend Complaint to remove the claims subject to remand to the lower court.

The purpose of this amendment is to facilitate the opening of the case and subsequent hearing of the additional claims, while also adhering to the order precluding the consideration of claims subject to the remand.

Approving this motion to amend the complaint to exclude said claims would ensure judicial efficiency and fairness while averting excessive costs and burdens associated with re-filing and re-issuing summons.

Plaintiff firmly believes that allowing this amendment is in the best interests of justice, as it will contribute to a fair and expeditious resolution of the matter at hand. Plaintiff respectfully asks for the court's permission to proceed with the proposed amendment.

## CERTIFICATE OF SERVICE

I certify that on March 16, 2024, I emailed a true copy of this Motion to the following parties at the addresses set forth below.

Tracy White  
Department of Justice  
Tracy.I.White@doj.state.or.us

Sam Chapman  
Healing Advocacy Fund  
sam@healingadvocacyfund.org

Tom Eckert  
InnerTrek  
tomeckert1@gmail.com

Date: March 16, 2024

A handwritten signature in black ink, appearing to read 'Shasta Winn', written over a horizontal line.

Shasta Winn